Attachment 19

```
 1                BEFORE THE WASHINGTON UTILITIES AND
 2                   TRANSPORTATION COMMISSION
 3    In the Matter of the        )
      Investigation into          )
 4                                )
      U S WEST COMMUNICATIONS, INC.'s )  Docket No. UT-003022
 5                                )    Volume LVIII
      Compliance with Section 271 of )  Pages 8122 to 8329
 6    the Telecommunications Act of )
      1996                        )
 7    -------------------------------)
      In the Matter of            )
 8                                )    Docket No. UT-003040
      U S WEST COMMUNICATIONS, INC.'s )  Volume LVIII
 9                                )    Pages 8122 to 8329
      Statement of Generally      )
10    Available Terms Pursuant to )
      Section 252(f) of the       )
11    Telecommunications Act of 1996 )
                                   )
12
13             A hearing in the above matters was held on
14    June 6, 2002, at 9:30 a.m., at 1300 South Evergreen Park
15    Drive Southwest, Room 206, Olympia, Washington, before
16    Administrative Law Judge ANN RENDAHL and Chairwoman
17    MARILYN SHOWALTER and Commissioner RICHARD HEMSTAD and
18    Commissioner PATRICK J. OSHIE.
19
               The parties were present as follows:
20
               QWEST CORPORATION, by LISA ANDERL, Attorney
21    at Law, 1600 Seventh Avenue, Suite 3206, Seattle,
      Washington 98191, Telephone (206) 345-1574, Fax (206)
22    343-4040, E-Mail landerl@qwest.com; and by ANDREW CRAIN,
      Attorney at Law, 1801 California Street, Suite 4900,
23    Denver, Colorado 80202, Telephone (303) 672-2734, Fax
      (303) 295-7069, E-mail acrain@qwest.com
24
      Joan E. Kinn, CCR, RPR
25    Court Reporter
```

1   WORLDCOM, INC., by MICHEL SINGER-NELSON and
THOMAS F. DIXON, Attorneys at Law, 707 - 17th Street,
2   Suite 4200, Denver, Colorado 80202, Telephone (303)
390-6106, Fax (303) 390-6333, E-mail
3   michel.singer nelson@wcom.com.

4   AT&T, by MARY B. TRIBBY Attorney at Law, 1875
Lawrence Street, Suite 1575, Denver, Colorado 80202,
5   Telephone (303) 298-6508, Fax (303) 298-6301, E-mail
mtribby@lga.att.com.
6
          COVAD COMMUNICATIONS COMPANY, by MEGAN
7   DOBERNECK, Attorney at Law, 7901 Lowry Boulevard,
Denver, Colorado 80230, Telephone (720) 208-3636, Fax
8   (720) 208-3256, E-mail mdoberne@covad.com.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1   name of our company. KPMG Consulting is the name of our
2   company.
3   Q.   One of the exclusions, I believe it was
4   closed unresolved, related, it was exclusion 3107.
5   A.   (Mr. Weeks.) Exception 3107?
6   Q.   Yes.   .
7   A.   (Mr. Weeks.) Okay.
8   Q.   Which is the CEMR volume P test at 16-3-5,
9   one of the things Qwest responded in connection with
10 this particular exception is that it conducted its own
11 tests, I believe at higher volumes; do you recall that?
12   A.   (Mr. Weeks.) I understand that the company
13 represented that, if that's the question.
14   Q.   So based on your response then, KPMG did not
15 actually observe or participate with Qwest in conducting
16 those three other tests?
17   A.   (Mr. Weeks.) Correct, any testing that Qwest
18 did on its own and any information about those tests
19 that it has introduced into the record in any way we
20 have not reviewed or audited or participated in those
21 Qwest internal conducted tests.
22   A.   (Mr. Dellatorre.) Or incorporated the
23 results of that into reaching our conclusions.
24   Q.   Would you consider those tests to be a
25 substitute for a test that KPMG Consulting itself would

1   or could have run?
2   A.   (Mr. Weeks.) No.
3   Q.   Mr. Weeks, and I may be wrong about this, I
4   believe you said yesterday that CEMR was little or
5   infrequently used by CLECs; is that --
6   A.   (Mr. Weeks.) No, that was MEDIACC EB-TA.
7   JUDGE RENDAHL: Can you spell MEDIACC for the
8   court reporter.
9   MR. WEEKS: It's an acronym, it's not
10   actually a word, and I will have to look it up, it's
11   M-E-D-I-A-C-C, and then it's E-B, which is an acronym,
12   hyphen, T-A, which is an acronym.
13   JUDGE RENDAHL: Thank you.
14   BY MS. DOBERNECK:
15   Q.   I would like to turn now to exception 3055,
16   which related to inaccurate closeout codes for trouble
17   tickets.
18   JUDGE RENDAHL: Ms. Doberneck, are you aware
19   if there is an exhibit related to that?
20   MS. DOBERNECK: Probably.
21   JUDGE RENDAHL: Let's be off the record for a
22   moment.
23   (Discussion off the record.)
24   JUDGE RENDAHL: While we were off the record,
25   we determined that the KPMG disposition report from

1 February 7th, 2002, is Exhibit 1762, and Qwest's
2 supplemental response, actually it's dated earlier, it's
3 February 1st, 2002, is Exhibit 1763, but it's also
4 referenced in KPMG's handout, Exhibit 1700, at page 6.
5   Go ahead, Ms. Doberneck, I'm sorry to
6 interrupt you.   .
7   MS. DOBERNECK: No problem, thank you, Your
8 Honor.
9 BY MS. DOBERNECK:
10   Q.   One of the things in Qwest's response is that
11 in certain of the examples provided by KPMG that in the
12 narrative field was actually the -- an extended
13 commentary that more accurately or correctly reflected
14 what the closeout code was. Do you --
15   A.   (Mr. Weeks.) What the problem that was
16 detected.
17   Q.   Yes.
18   A.   (Mr. Weeks.) Not what the closeout code was.
19   Q.   Sorry, I misspoke, thank you for correcting
20 me. And Qwest also stated that those narrative fields
21 have primacy over the code that was assigned with what
22 the trouble was. Do you recall that response on behalf
23 of Qwest?
24   A.   (Mr. Weeks.) I don't directly recall it, but
25 I won't dispute it. It sounds like what would have been

1   said.
2   Q.   Well, let me ask you, did KPMG have any
3   understanding or knowledge that the narrative field did,
4   in fact, have primacy over the codes contained?
5   A.   (Mr. Dellatorre.) No, we did not. In fact,
6   the reason that this is closed·unresolved is because we
7   believe that the closeout codes needed to be the correct
8   information. If we believed that the narrative fields
9   were primary or that the first source of data and those
10 in fact reflected the activities that took place to
11 close the trouble, then we would have closed resolved
12 this exception.
13   Q.   If you can, can you tell me why KPMG
14 considered the codes to be, for lack of a better word,
15 dispositive as to whether the trouble was correctly
16 reflected or not?
17   A.   (Mr. Weeks.) What we -- our concern in this
18 case was built around a belief that these codes would be
19 subsequently analyzed across universes of troubles
20 looking for patterns, looking for consistency or
21 inconsistency between and among different work centers
22 and the like, and that the accuracy of that information
23 was important so that as these universes of information
24 were analyzed, one could draw the correct inferences
25 about what was -- where was the source of the problem

1   and what was the nature of the fix and so on. And so
2   that was our belief, our understanding, our reasoning
3   behind believing that the codes themselves were
4   important.
5   It's much more difficult to parse the,
6   there's that word again, to go through the written
7   comments in the notes field and do the same type of
8   computational processing looking for patterns and
9   looking for things, and so we felt that if the codes
10   were properly filled out that it would assist the
11   management control feedback loops that need to sit over
12   the maintenance and repair process more effectively than
13   a handful or a set of written comments that were down in
14   the remarks field, and that was our position.
15   Q.   Let me clarify one further thing. Did KPMG,
16   were you provided with or did you ever see any
17   documentation that would or should have alerted you that
18   you also needed to consider the narrative field in terms
19   of --
20   A.   (Mr. Weeks.) I can't say yes or no on that.
21   Q.   One of the, as I understand it, one of the
22   other areas of dispute with regard to exception 3055 was
23   the selection by KPMG of a 95% standard versus looking
24   at one of the PIDs, and I believe -- well, actually let
25   me not recall what I heard yesterday, but can you tell

1   me why for this particular criteria that you were
2   measuring you chose 95% versus some sort of analogous or
3   identical PID?
4   A.   (Mr. Weeks.) As I attempted to describe
5   yesterday, we in this set of tests were focused on
6   looking at how well Qwest followed its methods and
7   procedures for working troubles and preparing closeout
8   reports, and we set up evaluation criteria that got to
9   the heart of that issue. Did they in fact do what they
10   said they were supposed to do the way they said that
11   they were supposed to do it, and did they fix the
12   problems the way we believed that they should be fixed.
13   So we had a very narrow and focused test on that aspect
14   of things.
15   And Qwest proposed that we use a PID whose
16   purpose in the long run might accomplish highlighting
17   issues that occurred of the nature we were trying to
18   uncover. If, in fact, problems were not being fixed the
19   first time, which was one of the issues, then clearly
20   that would show up in the PID if it was done
21   consistently and on any large scale. It would appear in
22   the PID, we don't dispute that, we're in agreement with
23   Qwest on that. But that -- the focus of our test wasn't
24   so much the overall universe of performance across a
25   large number of repairs and troubles, as Mr. Dellatorre

1   me why for this particular criteria that you were
2   measuring you chose 95% versus some sort of analogous or
3   identical PID?
4   A.   (Mr. Weeks.) As I attempted to describe
5   yesterday, we in this set of tests were focused on
6   looking at how well Qwest followed its methods and
7   procedures for working troubles and preparing closeout
8   reports, and we set up evaluation criteria that got to
9   the heart of that issue. Did they in fact do what they
10 said they were supposed to do the way they said that
11 they were supposed to do it, and did they fix the
12 problems the way we believed that they should be fixed.
13 So we had a very narrow and focused test on that aspect
14 of things.
15   And Qwest proposed that we use a PID whose
16 purpose in the long run might accomplish highlighting
17 issues that occurred of the nature we were trying to
18 uncover. If, in fact, problems were not being fixed the
19 first time, which was one of the issues, then clearly
20 that would show up in the PID if it was done
21 consistently and on any large scale. It would appear in
22 the PID, we don't dispute that, we're in agreement with
23 Qwest on that. But that -- the focus of our test wasn't
24 so much the overall universe of performance across a
25 large number of repairs and troubles, as Mr. Dellatorre

 1 indicated earlier.
 2   What we were looking for is very microscopic
 3 detailed adherence to process and procedure and repairs,
 4 believing that if we could demonstrate that that
 5 happened consistently and repeatably that we had good
 6 evidence that there was a repeatable process that could
 7 be relied on to operate effectively and produce
 8 information that was accurate that could be used for
 9 other purposes and analysis. So it was a slightly
10 different purpose that we were doing our activities than
11 the purpose of the PID.
12   A.   (Mr. Dellatorre.) And a second factor that
13 entered into our decision was that the comparable PID
14 that Mr. Weeks is referring to is actually a parity PID,
15 which implies that there is a retail and whole -- there
16 are retail and wholesale processes that are similar
17 enough so that the measurement of those two events are
18 comparable in terms of measuring performance. The
19 actual activity that we were conducting, there is no
20 retail equivalent measurement, and therefore we didn't
21 think that applying a parity concept was appropriate and
22 hence set a bench mark type evaluation measure.
23   A.   (Mr. Weeks.) Just to clarify that, the basic
24 maintenance and repair procedures are, in fact, the same
25 between wholesale and retail.

1   A.   (Mr. Dellatorre.) Right.
2   A.   (Mr. Weeks.) But what we were measuring,
3   which was the ability to write down a proper closeout
4   code, didn't matter whether it was wholesale or retail,
5   it's the same process, it's the same techniques. And we
6   looked at it as you either got· it right or you didn't
7   yet get it right, and it would have the same impact on
8   wholesale and retail. But it didn't strike us that the
9   thing that we were looking at called out for a parity
10   measurement.
11   Q.   And am I safe in assuming that in determining
12   what you were looking at and the standard to apply, that
13   that was based on KPMG's professional judgment and
14   experience?
15   A.   (Mr. Weeks.) That's correct.
16   Q.   Now you state or KPMG Consulting states at
17   page 72 of its final report, which is Exhibit 1697, and
18   it's just a rephrasing of what you already said, is that
19   if no defined PID standard was established, KPMG
20   Consulting used its professional judgment to evaluate
21   performance. In the context of this statement and
22   KPMG's decision to exercise its professional judgment,
23   was the fact that KPMG would be doing that known in
24   advance to the ROC or to Qwest or to CLECs, or is that
25   something that sort of developed as you went through the

1 test and had to develop criteria for the particular
2 things you were looking at?
3   A.   (Mr. Weeks.) I would -- I would say that for
4 those who had been active participants in the ROC '
5 process and those who had observed and looked at other
6 OSS tests that preceded the ROC test, for those
7 participants, I would speculate that they understood how
8 we did evaluations. I would be representing what they
9 thought, which is a little bit dangerous for me to do,
10 but I would be surprised if folks didn't understand that
11 ahead of time.
12   Q.   Did any party or any commission or commission
13 staff ever register or lodge an objection to KPMG in its
14 professional capacity exercising its judgment to
15 determine what an appropriate criteria or standard
16 should be?
17   A.   (Mr. Weeks.) I can't think of a -- there
18 were people that disagreed with the standard we applied.
19 I don't recall people disagreeing that we should apply
20 standards. The implication of not doing that would be
21 that there would have to be PIDs established for
22 thousands of things, or hundreds at least, for which
23 there weren't existing PIDs and for which I'm not sure
24 people had an appetite to establish PIDs. For example,
25 you know, a document is well formed. I'm not sure how

1   the PID standard would work for that or what you would
2   apply there, so there's a vast number of evaluation
3   criteria in this test that are based on our professional
4   judgment, and I don't have a specific recollection of
5   anyone raising an objection to us using professional
6   judgment.   .
7   CHAIRWOMAN SHOWALTER: Ms. Doberneck, can you
8   just give me the cite, you read a quote from the report
9   and I can't find it.
10   MS. DOBERNECK: I think from Mr. Crain, I
11 have it on page 72 but I know -- and I have the same
12 pagination as Mr. Crain does.
13   MR. WEEKS: I can tell you, it's just above
14 the cite heading 3.0 results summary. It is the last
15 sentence in the paragraph two paragraphs above that, and
16 it is page 72.
17   CHAIRWOMAN SHOWALTER: Thank you.
18   MR. DELLATORRE: And, in fact, that language
19 repeats itself throughout the report in that same
20 section.
21   MR. WEEKS: Section 2.5, analysis methods of
22 all the report sections.
23 BY MS. DOBERNECK:
24   Q.   I would like to ask you a few questions about
25 test 12.7, which deals with loop qualification

Attachment 20

Timothy Boykin
District Manager

March 12, 2002

Via Facsimile and U.S Mail

Scott Schipper
General Manager Wholesale Major Markets
Qwest Communications
200 South 5th Street, #2400
Minneapolis, Minnesota 55402

RE: Request to resolve billing disputes

Dear Scott:

AT&T's billing department requested my assistance to resolve ongoing problems they are experiencing with Qwest's UNE-P bills. I, in turn, am now asking for your assistance to resolve these issues.

History of the Issues

As you are aware, Qwest uses regional CRIS billing systems. For UNE-P, AT&T cannot process CRIS bills electronically. AT&T obtains a paper bill for its UNE-P accounts. For each state, AT&T receives a bill with a cover page showing the total amount due, account level adjustments, account level payments applied, account level credits and account level transfers of balance. In addition, for each WTN there is a separate detailed bill attached. Depending on the Qwest region, there may also be a summary of charges by category such as monthly recurring expenses, usage, pay per use, long distance and directory assistance.

AT&T entered the UNE-P market for small business in Colorado during the month of November 2001, and the Washington and Arizona markets in December 2001. During the first couple of months the sales volumes were fairly minimal. AT&T was able to manually identify billing discrepancies and worked with Qwest to resolve the issues. However, in the past month and a half volumes have increased significantly. Due to the CRIS billing format, it is very labor intensive to manually go through all of the bills and validate charges.

In order to validate the charges for each WTN, AT&T must manually review each separate bill by WTN and transcribe, by state, into an excel spreadsheet to sum the individual WTN expenses. During this exercise, AT&T identified several questionable, erroneous and invalid charges. These inappropriate charges include the following:

1

- Directory advertising charges should not appear on UNE-P bills, however, the charges are appearing.
- In a platform environment usage should be billed on a MOU basis for originating and terminating usage, however, in some cases, Qwest is billing long distance charges on a retail basis on an individual call basis.
- Long distance charges for other interexchange carriers should not appear on UNE-P bills.
- An explanation of charges should be provided for special service charges, 800 service line and business privilege charges.
- Details of balance transfers should be provided to validate expenses.
- Details of debit and/or credit adjustments should appear at the account level.
- The discrepancies in the bills are not consistent across Qwest's three regions.

AT&T and Qwest jointly agreed to set up monthly calls to review the identified billing issues. The initial call took place on January 24, 2002. Terry Kopp and Terry Cloke attended on behalf of Qwest's billing dispute center, Geri Lancaster, Diane Oaks and Patty McDaniel attended on behalf of AT&T. During this call the charges in question were reviewed. AT&T advised of the difficulty identifying the charges in the format provided. AT&T also advised that in the future, as the volume of WTNs increased, AT&T would be unable to identify the discrepancies at a WTN level. As a result, AT& T would deduct the charges in dispute until a resolution was received. Terry Kopp and Terry Cloke advised that Qwest only accepts claims at a WTN level, and that according to the interconnection agreement, AT&T was obligated to pay the bills in full and issue claims for refunds.

Although AT&T initially withheld some of the disputed sums, AT&T has paid the Qwest bills in their entirety and issued itemized claims for the disputed amounts. However, AT&T cannot find any clause or statement in the interconnection agreements or applicable tariffs indicating that AT&T is required to pay disputed amounts. Attachment 2 to the UNE-P amendment in all three states provides the following:

> "Section 6 Qwest shall provide CLEC, on a monthly basis, within 7 – 10 calendar days of the last day of the most recent billing period, in an agreed upon standard electronic billing format, billing information including (1) a summary bill, and (2) individual end user customer sub-account information consistent with the samples available for CLEC review."

Based on the applicable interconnection agreement language and tariffs, AT&T does not believe that it is obligated to pay disputed amounts which clearly should not be appearing on the bills. Consequently, in the future, AT&T will withhold payment of clearly disputed amounts.

Dispute History by State

AT&T has spreadsheets and back-up information to support each of the disputed amounts through the January 2002 bills. This documentation has been provided to Qwest with the exception of the 2/5/02 and 2/7/02 bill dates. This information is available and can be provided again. For purposes of this letter, the amounts will only be summarized by bill per state. AT& T can provide the support documents if requested by Qwest.

Colorado –

- 12/7/02 bill – A claim has been submitted to dispute Sprint long distance charges in the amount of $15.20.
- 1/07/02 bill – A claim has been submitted to dispute $801.78 for erroneous charges for directory advertising, taxes and long distance charges.
- 2/7/02 bill – A claim is in the process of being submitted for erroneous directory advertising, long distance and service charges in the amount of $938.56 and for explanations on balance transfers and certain adjustments.

Washington

- 1/5/02 bill – A claim has been submitted to dispute directory advertising, directory assistance, special service charges, pay-per-use and long distance charges in the total amount of $6,284.21.
- 2/5/02 bill – A claim is in the process for disputing a total of $30,428.41 for erroneous charges for directory advertising, long distance, 800 service line, business privilege and service charges.

Arizona

- 1/7/02 bill – A claim has been submitted to dispute $31.78 for long distance charges.
- 2/7/02 – A claim is in the process of being processed for erroneous directory advertising charges in the amount of $1,175.90, and an explanation of the balance transfer in the amount of $359.02.

Resolution

AT&T believes that it is now to the point where the number of WTNs it serves with UNE-P is increasing exponentially. For example, during the month of February AT&T issued in excess of 10,000 new installs for UNE-P. Resolving this number of WTNs in a paper environment is unmanageable. AT&T would like to schedule a meeting between AT&T and Qwest subject matter experts to see if an acceptable resolution can be determined. Once Qwest implements CABS, AT&T should be able to electronically manipulate the bills and validate charges much more efficiently. AT&T understands that Qwest has committed to implementing CABS in July 2002. AT&T is interested in reaching an interim solution until CABS is in place. As you can imagine, this problem will be exacerbated by any delay in Qwest's implementation of CABS billing.

After you have had a chance to review this letter, let's discuss the most appropriate manner to proceed. I look forward to discussing these issues with you in the near future.

As always, thank you for your time.

Very truly yours,

Timothy Boykin
District Manager
AT&T Local Services and Access Management

Attachment 21

REPORT 7 - Products offered in AZ

IMA EDI Disclosure	Document Description	Exists in SATE 70	Exists in SATE 80	Required Product in Arizona	Tested by HP
AAQ - AAR	Appointment Availability	Yes	Yes	Yes	Yes
ANLG	Unbundled Analog (ANA) Line-Side Switch Port	No	No	No	No
ASQ - ASR	Appointment Reservation	Yes	Yes	Yes	Yes
AVQ - AVR	Address Validation by Address	Yes	Yes	Yes	Yes
AVQ - AVR	Address Validation by TN	Yes	Yes	Yes	Yes
C21	Centrex 21	No	No	No	No
C21	Centrex 21 Resale Services	No	No	No	No
CEX	Centrex Plus/Centron Services	Yes	Yes	No	Yes
CFAQ - CFAR	Connecting Facility Assignment	Yes	Yes	Yes	Yes
COMP	Completion	Yes	Yes	Yes	Yes
CSRQ - CSRR	Customer Service Record via EDI	Yes	Yes	Yes	Yes
CSRQ - CSRR	Customer Service Record via FTP or Email	No	No	Yes	No
CTQ-CTR	TN/Appt Cancellation	No	No	Yes	No
DGTL	Unbundled Digital Line-Side Switch Port	No	No	No	No
DIOT	DID in Only Trunk	No	No	No	No
DL	Directory Listing - Simple	No	No	No	No
DL	Directory Listings Only	Yes	No	Yes	Yes
DLRQ - DLRR	Design Layout Request	No	No	Yes	No
DTR	Design Trunk	No	No	No	No

IMA EDI Disclosure	Document Description	Exists in SATE 70	Exists in SATE 80	Required Product in Arizona	Tested by HP
DTR	Design Trunk Resale	No	No	No	No
EEL	EEL/UNE Combination	No	No	No	No
FA	Functional Ack	Yes	Yes	Yes	Yes
FAQ - FAR	Facility Availability Convert POTS to Unbundled Loop	Yes	Yes	Yes	Yes
FAQ - FAR	Facility Availability ISDN Capable Loop	No	No	Yes	No
FAQ - FAR	Facility Availability POTS FacilityAvailability	Yes	Yes	Yes	Yes
FAQ - FAR	Facility Availability Unbundled ADSL	Yes	Yes	Yes	Yes
FATAL	Fatal Error Response	Yes	Yes	Yes	Yes
FBDL	Facility Based Directory Listings	No	No	No	No
FOC	Firm Order Confirmation	Yes	Yes	Yes	Yes
INP	Interim Number Portability	No	No	No	No
ISDN	Resale BRI ISDN Order Submittal	No	No	No	No
ISPF	PRI ISDN Facility	No	No	No	No
ISPT	PRI ISDN Trunks	No	No	No	No
JEOP	Jeopardy	Yes	Yes	Yes	Yes
LO	Directory Listings Only	No	Yes	Yes	Yes
LS	Unbundled Loop	Yes	Yes	Yes	Tested
LSNP	Unbundled Loop w/ NP	Yes	Yes	Yes	Yes
LSRSQ - LSRSR	Service Order Status Inquiry Transaction	No	No	No	No
LSRSQ - LSRSR	Service Request Status Inquiry	No	No	No	No
MPQ-MPR	Meet Point	Yes	Yes	Yes	Yes
MR	Megabit	No	No	No	No

IMA EDI Disclosure	Document Description	Exists in SATE 70	Exists in SATE 80	Required Product in Arizona	Tested by HP
NF	Non-Fatal Error Response Transaction	No	No	Yes	No
NF	Non-Fatal Response	No	No	Yes	No
NP	Local Number Portability	Yes	Yes	Yes	Yes
PAL	Public Access Line	No	No	No	No
PALC	Public Access Line	No	No	No	No
PALPSP	Public Access Line - PSP	No	No	No	No
PBX	PBX	No	No	No	No
PL	Resale Private Line Order Submittal	No	No	No	No
POTS	POTS Resale Order	Yes	Yes	Yes	Yes
PSP	Public Access Line - PSP	No	No	No	No
QDSL	Qwest DSL	No	No	No	No
RFR	Resale Frame Relay	No	No	No	No
RLDQ-RLDR	Raw Loop	Yes	Yes	No	Yes
SAQ - SAR	Service Availability	Yes	Yes	Yes	Yes
SL	Shared Loop	Yes	Yes	Yes	Yes
SU	Status Change Inquiry	Yes	No	Yes	Yes
SU	Status Updates – Auto Push	No	Yes	Yes	Yes
TNAQ - TNAR	Telephone Number Availability	Yes	Yes	Yes	Yes
TNSQ - TNSR	Telephone Number Availability	Yes	Yes	Yes	Yes
UADT	Unbundled Analog	No	No	No	No
UADT	Unbundled Analog DID/PBX Trunk	No	No	No	No
UCEX	UNE-P Centrex Plus and Centron	No	Yes	No	Yes
UCX	UNE-P Centrex Plus and Centron	Yes	No	No	Yes

IMA EDI Disclosure	Document Description	Exists in SATE 70	Exists in SATE 80	Required Product in Arizona	Tested by HP
UCX21	UNE P Centrex 21	No	No	No	No
UCX21	UNE-P Centrex 21	No	No	No	No
UDL	Unbundled Distribution Loop	Yes	Yes	No	Yes
UDLNP	Unbundled Distribution Loop w/ NP	Yes	Yes	No	Yes
UDSF	UNE-P DSS FACILITY	No	No	No	No
UDST	UNE-P DSS TRUNK	No	No	No	No
UDTF	DS1 DID PBX Trunk Port Facility	No	No	No	No
UDTR	DS1 DID PBX Trunks	No	No	No	No
UFL	Unbundled Feeder Loop	No	No	No	No
UNEC	UNE-C PL/EEL	No	No	No	No
UNEIB	UNE-P BRI ISDN	No	No	No	No
UNEP	UNE-P POTS	Yes	Yes	Yes	Yes
UPDET	UNE-P PBX DESIGN TRUNK	No	No	No	No
UPDIT	UNE-P PBX DID IN ONLY TRUNK	No	No	No	No
UPIF	UNE-P PRI ISDN FACILITY	No	No	No	No
UPIT	UNE-P PRI ISDN TRUNK	No	No	No	No

IMA EDI Disclosure	Document Description	Exists in SATE 70	Exists in SATE 80	Required Product in Arizona	Tested by HP
Total Count of Functionality in the IMS EDI Disclosure				80	
Total Count of Capability in SATE				34	
Total Count of Capability not in SATE				46	
Percent Capability not in SATE				57.50%	
Total Count of Capability Used by CLECs in Arizona				34	
Total Count of Capability Used by CLECS not in SATE				6	
Total Count of Capability tested by HP				34	
Total Count of Capability not tested by HP				0	

Attachment 22

ride the light

Qwest
1020 Nineteenth Street NW, Suite 700
Washington, DC 20036
Phone 202.429.3125
Facsimile 202.293.0561

R. Hance Haney
Executive Director - Federal Regulatory

July 15, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW TW-B204
Washington, DC 20554

> Re: Application by Qwest Communications International, Inc. for
>   Authorization Under Section 271 of the Communications Act to Provide
>   In-Region, InterLATA Service in the States of Colorado, Idaho, Nebraska,
>   and North Dakota, WC Docket No. 02-148

Dear Ms. Dortch,

In response to questions from Department of Justice staff, Qwest provided the attached
materials regarding Qwest's Stand-Alone Test Environment (SATE) to the Department of
Justice on Thursday and Friday, July 11 and 12, 2002. This material is hereby submitted
for inclusion in the record for the above-referenced proceeding.

The twenty page limit does not apply as set forth in DA 02-1390.

Sincerely,

Hance Haney

cc.   M. Carowitz   C. Post
         E. Yockus   P. Fahn
         G. Remondino   B. Smith
         M. Cohen
         J. Jewel
         P. Baker

Pre-Order Transaction	Total BPL Errors (SATE and Production)[1]	Total Production Legacy System Errors[2]	Total SATE-coded Legacy System Errors[3]	Percentage of Production Errors Available in SATE
Appointment Availabilty Query[4]	27	4	0	87.10%
Appointment Selection Query[4]	14	3	0	82.35%
Address Validation Query	30	19	3	67.35%
Connecting Facility Assignment Query	15	10	3	72.00%
CSR Retreival	54	39	3	61.29%
Facility Availability Query	57	37	6	67.02%
Loop Qualification Query	47	6	2	92.45%
Meet Point Query	27	3	1	93.33%
Raw Loop Data Query	40	0	0	100.00%
Service Availability Query	11	0	0	100.00%
Telephone Number Availability Query[4]	53	13	0	80.30%
Telephone Number Selection Query	16	0	0	100.00%

[1] As production and SATE use the same IMA software, including the Business Processing Layer (BPL), the BPL errors are the same in both systems.

[2] The Total Production Legacy System Errors column reflects the number of legacy system errors seen in production in the six months from December 2001-May 2002.

[3] CLECs can use the SATE data request process to request any additional legacy system error(s) be coded into SATE. To date, no requests for additional legacy system errors have been received from any CLEC.

[4] The Appointment and Telephone Number (TN) Reservation transactions have no associated SATE coded legacy messages due to the nature of the legacy error messages in production. For example, the legacy system errors (1) cannot be replicated in SATE due to the dynamic nature of daily production processing (for example, the "legacy system unavailable" message when a legacy system outage occurs); or (2) are not commonly seen in production.

SATE Mirroring Production

- The purpose of interface testing is to ensure that the CLEC's EDI interface (its code) works properly with the Qwest systems. More specifically, the purpose is to assure CLECs that their systems will be able to receive and display error messages and other responses, such as FOCs.

- For order transactions, CLECs receive error messages generated by the Business Processing Layer (BPL) of IMA. These messages are identical to production error messages because they are generated by a copy of IMA code.

- For pre-order transactions, error messages are generated both by the BPL and by systems and databases that lie behind IMA – so-called "legacy systems," which generate "legacy error messages." In SATE, which is a test environment separate from production, the legacy error messages are simulated to mimic the responses that would be received if the test transactions were actually sent to the production legacy systems.

- Each SATE test scenario is intended to generate a particular test response. The test response has the same structure as the production response. If a CLEC receives the prescribed test response, it knows that its code will work properly in production, even if the production response differs somewhat from the SATE test response.

- Not every possible legacy error response is duplicated in SATE, because there are so many possible responses, and it is not necessary to test all those permutations in order to be satisfied that the CLEC's code will work in production. It therefore makes no sense for Qwest to incur the expense and effort of coding every possible legacy system error into SATE, when doing so would provide no additional benefit to CLECs. Even though Qwest has offered to code additional error messages into SATE upon CLEC request, it has to date not received any such requests.

- What matters in interface testing is that the response comes back in a consistent format every time, and that the correct field is populated. The content of the error message received is not important because the CLEC's EDI code will not act on the content of the error message; that will be done by a human being.

1

- A CLEC's software works with the structure, not the content, of the messages. Each pre-order response transaction type has the same structure through which error messages are returned. Thus, once a CLEC has tested and confirmed its ability to receive an error message for a particular transaction type, it can be confident that it will be able to receive and process additional error messages for that same transaction type.

- To be more specific, each order type and pre-order transaction type has a different "map." The "map" is the format for how transactions come to Qwest and how they go out. Error messages within a map have "a tag" that remains consistent regardless of the error message received back within that transaction type. For example, the tag "MTX" will always be associated with the error message returned. The CLEC needs to be able to receive the error message in the appropriate field, so that it can be relayed to its destination for handling by a human being. This ensures that all error messages can be processed.

- A CLEC can test its map by transmitting a few test transactions for each transaction type, and by receiving only a few error message responses. Once the CLEC confirms the map is working properly, they know that all error messages will be processed correctly regardless of which system originates the error message.Thus, a CLEC does not have to run a test transaction for all possible error messages, since the error messages all have the same structure and work the same way.

- In sum, by coding a relatively small percentage of possible error messages into SATE, CLECs are able to test their ability to process 100 % of the possible error messages they would receive in production. Attached to this filing is a chart quantifying the number and percentage of error messages coded into SATE versus production.

- Qwest documents the manner in which SATE responses differ from production responses, and documents which production error messages are not included in SATE. Qwest will add to SATE any other error messages or test scenarios that a CLEC requests, ten days or less after being approved. Significantly, no CLEC to date has asked Qwest to include additional error messages in SATE.

2

<u>Examples:</u>

The following are examples of instances in which the SATE response is not identical to the production response. These examples show that while the responses may not be identical, the purpose of interface testing is fulfilled in each case.

(1) Reservation of an appointment longer than 8 hours.

In the production environment, the error message returned would be the equivalent of "you cannot reserve an appointment longer than 8 hours."

In SATE, the error message would be the equivalent of "no appointment available," because the specific error message that would issue in production is not coded into SATE (though it could be, on request).

(2) Retrieval of a CSR using an incorrect circuit ID number.

In the production environment, if you query using a circuit ID number that is not listed in the table (the table that matches circuit ID numbers to CSRs), you get an error message that is equivalent to "missing reference data in CRIS (circuit ID number not listed)."

In SATE, the error message would be the equivalent of "no active account." The circuit ID table that matches circuit ID numbers to CSRs is not coded into SATE.

(3) Entry of incorrect zip code in preorder query.

Qwest associates each zip code in its 14-state region with a particular geographic area (a "CALA"). This enables Qwest to identify which database an address will be stored in, to more efficiently store and access this information.

In the production environment, when a CLEC enters a zip code that is outside the 14-state Qwest region, an error message will be returned that is the equivalent of "no CALA match for that zip code."

In SATE, the error message that would be returned would be equivalent to "address not found."

In each of these examples, the production error message differs from the SATE error message in its degree of specificity. For interface testing purposes, the specificity of the error message received is not what the CLEC relies upon for purposes of developing its EDI interface. Rather, what is important is whether the CLEC can receive and display the error message.

3

4

In these examples, the CLEC can successfully test its ability to receive the more specific production error message by testing in SATE, even though it may not actually receive the identical error message in SATE that it will receive in production. SATE permits the CLEC to test whether its code will enable it to receive all the error messages generated in production. The differences between the SATE response and the production response therefore are immaterial.

Put differently, it is not necessary, nor is it the CLECs' desire, to run every possible test transaction and elicit every possible production response in order to be assured that the CLEC's code will reveal the responses once the CLEC is in production. In this regard, it is significant that no CLEC to date has asked Qwest to include additional error messages in SATE.

Additional points:

- As the FCC has held, the testing environment need not be identical to production, as long as the testing and production environments "perform the same key functions." *Texas 271 Order*, 15 FCC Rcd 18354, 18421 (¶ 138) (2000). This SATE clearly does, by enabling CLECs to test in SATE their ability to receive and process every response they might receive in production.

- The SATE Users' Group has not objected to the scope and type of error messages generated in SATE.

- As of June 1, 2002, 16 CLECs have tested in SATE and gone into production (five of these through a service bureau).

- To further mirror production, Qwest has (1) implemented test flow-through capability, which allows CLECs to test whether an order would flow through in production, (2) added automated post-order response capability in VICKI, and (3) added a test service order processor.

5

Attachment 23

Pre-Order Transaction	Total BPL Errors (SATE and Production)	Total Production Legacy System Errors	Total SATE-coded Legacy System Errors	Percentage of Production Errors Available in SATE
Appointment Availability Query	27	4	0	87.10%
Appointment Selection "Query	14	3	0	82.35%
Address Validation Query	30	19	3	67.35%
Connectin Facility Assignment Query	15	10	3	72.00%
CSR Retrival	54	39	3	61.29%
Facility Availability Query	57	37	6	67.02%
Loop Qualification Query	47	6	2	92.45%
Meet Point Query	27	3	1	93.33%
Raw Loop Data Query	40	0	0	100.00%
Service Availability Query	11	0	0	100.00%
Telephone Number Availability Query	53	13	0	80.30%
Telephone Number Selection Query	16	0	0	100.00%
Total	391	134	18	77.90%

Total % Legacy system error codes in SATE *   **13.43%**

*Note: This includes Legacy system errors encountered by CLECs in the past six months.

Attachment 24

To: Bill Difference Distribution Group

From: Catriona Dowling

Date: July 11, 2002

Subject: BOS Version 37 Differences List – **UNE-P**

Attached is the updated BOS Version 37 Bill Differences List for QWEST. BOS Version 37 was installed into IABS production with release 83 on Apr 27, 2002. **This update refers to BDT output for Unbundled Products (UNE-P) only**.

Availability for producing specified UNE-P accounts in the CABS/BOS BDT format through the IABS system was implemented 7/1/02.
IABS is formatting the CABS/BOS BDT records for UNE-P products from bill/CSR data that is created by the system (CRIS) that currently produces the Unbundled Bills and CSR's. As a result, data may be unavailable for IABS to accurately populate all values on the BDT records. The following details some of the known data limitations:

In the case where an account (Telephone Number (TN)) has been disconnected, no CSR data will be available but there may be bill data. Therefore, the BDT file may contain Bill records (10-xx-xx) with no corresponding CSR records (40-xx-xx).

Re. CSR SERVICES AND FEATURES LEFT HAND FID DATA (40-15-05-00):
- The Circuit (CLS, CLT) is not provided as a left-handed FID on the CSR and as a result will not be produced on a 40-15-05 record. The circuit will be included in the FID data on the 40-15-10-00 record. However, the TN will be presented as a left-handed FID on the 40-15-05 record.

Re. Edits
- Standard BOS edits will not be performed since IABS is simply formatting the BOS BDT records. The data necessary to perform the edits is not available.

Please refer to the attachments.
If you have any further questions, please call me at (303) 624-0528.
Thank you,
Catriona

Attachments

Company Name: QWEST
BOS Version   37.0
Reason for Issue: **BOS 37 Update due to BOS Format of Unbundled Products**   IABS Release: 84.01
                                                                                          Implementation Date: 07/01/02
                                                                                          Issue Date: 07/11/02
                                                                                          Previous Issue Date: 05/31/02

Part 1 - Record Space Differences

Record Name	Record ID	Record Positions	Status	Standard Version	Explanation of Difference	Item Impl Date

Note: This difference was not accepted by the TRG and will be removed.

Key to Status Codes: N = new difference, C = change to existing difference, 1 = tariff/regulatory requirements, 2 = temporary assignment from BCR
3 = standard not implemented, 4 = deviation made standard, 5 = miscellaneous, see explanation of difference

.ompany Name: QWEST
BOS Version 37.0
Reason for Issue: **BOS 37 Update due to BOS Format of Unbundled Products**

IABS Release: 84.01
Implementation Date: 07/01/02
Issue Date: 07/11/02
Previous Issue Date: 05/31/02

Part 2 - Redefinition/Additional Values/Code Sets for Existing Data Elements

Data Element Name	Status	Standard	Explanation of Difference	Item Impl Date
Activity Date	5		Bill Processing Date will be populated in Activity Date	07/01/02
Adjustment Thru Date	5		Will contain the effective date of the Adjustment	07/01/02
Circuit Format Ind	5		Will contain spaces	07/01/02
Recurring/Non-recurring Charge Ind	5		Will always contain a value of '1'	07/01/02
Service Established Date	5		Bill Processing Date will be populated in Service Established Date field.	07/01/02
Total Taxes	5		Will include Surcharges when present	07/01/02
USOC/FID Ind	5		Will always contain the value of "2", indicating USOC. FID information is not available from the originating system.	07/01/02
Unbundled Usage Rate	5	V40	Redefined data characteristics from SV9(9) to S9(2)V9(7) in order to accommodate whole numbers.	. 07/01/02

*Note: This difference was not accepted by the TRG and will be removed.

Key to Status Codes: N = new difference, C = change to existing difference, 1 = tariff/regulatory requirements, 2 = temporary assignment from BCR
3 = standard not implemented, 4 = deviation made standard, 5 = miscellaneous, see explanation of difference

Company Name: **QWEST**
BOS Version   **37.0**
Reason for Issue: **BOS 37 Update due to BOS Format of Unbundled Products**   **IABS Release:**   **84.01**
                                                                                        Implementation Date: **07/01/02**
                                                                                        Issue Date: **07/11/02**
                                                                                        Previous Issue Date: **05/31/02**

Part 3 - New and Local Use Phrase Codes

Phrase Code	Phrase	Status	Standard Version	Explanation of Difference	Item Implementation Date
X15	Charge for Unbundled Services	5		Local Use Phrase for Unbundled products' OC&C's	07/01/02
X18	Adjustment for Unbundled Services	5		Local Use Phrase for Unbundled Products' Adjustments	07/01/02